## Operational Leakage

## Session 2

- Class 1 piping. Group thought that section 6.15 of GL 91-18 needed to a separate section for Class 1 leakage from Class 2 and 3 leakage.
- 10 CFR 50.55a. Revision to GL 91-18 should recognize approved code cases and reference 10 CFR 50.55a.
- Non-code repairs. Clarification is needed to discuss when NRC approval is required for non-code repairs of class components, especially Class 3 components.
- Heat exchanger leakage. GL 91-18 needs to address what licensees need to do with heat exchanger leakage, especially Class 2 heat exchangers, where leakage is across the interconnecting system boundary with no boundary leakage to the environment.
- Pressure boundary leakage. Given pressure boundary leakage, the GL should clarify what needs to be declared inoperable.
- Isolable leakage. GL 91-18 needs to explain that if you can isolate a component that is leaking, and it is reasonable to do so, isolating the component is a reasonable compensatory measure without further implications.